



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

August 31, 2017

BY ECF

The Honorable Alison J. Nathan
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

**Re: *United States v. Donque Tyrell, et al.*,
S2 15 Cr. 95 (AJN), S6 16 Cr. 95 (AJN)**

Dear Judge Nathan:

The Government writes jointly on behalf of the parties in the upcoming November 6, 2017 trial to propose the following schedule for motions and disclosures:

- October 9, 2017:
 - Motions in limine, voir dire, and requests to charge due;
 - Government provides notice of evidence it seeks to admit under Rule 404(b) of the Federal Rules of Evidence;
 - Government submits revised letter listing racketeering acts it may prove at trial.
- October 23, 2017:
 - Response to motions in limine due;
 - Parties to give expert notice.
- October 27, 2017:
 - Government turns over 18 U.S.C. § 3500 and *Giglio* material.¹
- November 3, 2017:
 - Exhibits due.

Defense counsel for Donque Tyrell, Dominick Sherland, and Carletto Allen, the remaining defendants, have consented to the proposed schedule. The Government respectfully

¹ To the extent that there are safety concerns for any particular witness, the Government reserves the right to withhold that witness's § 3500 material until closer to his or her testimony.

Cc: Larry Sheehan, Esq. (Counsel for Donque Tyrell)
Ed Sapone, Esq. (Counsel for Dominick Sherland)
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